

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2003 DEC 23 A 10:36

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES)

v.)

M.B.D. No.)

CASSANDRA ANN BEATTY)
and TERRENCE DAVIS)

Defendants.)
)

JOINT MOTION TO EXCLUDE TIME
FROM SPEEDY TRIAL ACT COMPUTATIONS

The parties, by their undersigned counsel, hereby move that, pursuant to 18 U.S.C. §§ 3161(b) and 3161(h), the Court exclude from all Speedy Trial Act calculations (including any calculations made pursuant to 18 U.S.C. § 3161(b)) the period beginning December 23, 2003 (the date of this motion) and extending for approximately 30 days thereafter (to and including January 30, 2003). As grounds therefor, the parties state as follows:

1. The defendants were arrested on December 2, 2002, after arriving at Logan Airport from Jamaica. On December 3, 2003, they were charged by criminal complaint with importation of cocaine, which they allegedly ingested. The defendants waived a detention hearing without prejudice and are currently in custody. The alleged drugs seized from the defendants on December 2, 2003, have been sent to the DEA laboratory for analysis. The government anticipates that those test results will be available by mid January 2003.

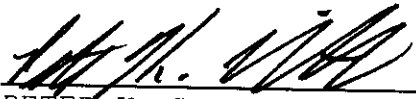
2. The parties believe that the additional time, particularly in light of the holiday schedule, will be beneficial to the parties in determining whether this case can be resolved without the need for the return of an indictment and believe that the ends of justice served by the delay outweigh the interest of the public and the defendants in a speedy trial.

Based on the foregoing, the parties jointly move that the time between December 23, 2003, and January 30, 2003, be excluded from all Speedy Trial calculations.

Respectfully submitted,


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Dated: December 23, 2003